

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>George E. Norcross, III, Gregory B. Braca, and Philip A. Norcross,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>Republic First Bancorp, Inc., Harry Madonna, Andrew B. Cohen, Lisa Jacobs, Harris Wildstein, Peter B. Bartholow, and Benjamin C. Duster, IV,</p> <p style="text-align: center;">Defendants.</p>	: : : : : : : : : : : : : : :	<p style="text-align: center;">CIVIL ACTION NO. 22-cv-04953 (BMS)</p>
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PLAINTIFFS' MOTION FOR EXPEDITED REMAND

Pursuant to 28 U.S.C. § 1447(c), Plaintiffs George E. Norcross, III, Gregory B. Braca, and Philip A. Norcross (“Plaintiffs”) respectfully move this Court for an order remanding this case to the Philadelphia Court of Common Pleas and imposing sanctions on Defendants, as set forth in the attached Proposed Order. The bases for this motion are set forth in Plaintiffs’ accompanying memorandum of law, Declaration of Laura E. Krabill, Esq., and attached exhibits, which are incorporated herein by reference.

WHEREFORE, Plaintiffs respectfully request that the Court enter the attached Proposed Order remanding the case, impose sanctions on Defendants, and grant such other and further relief as the Court deems just and proper.

Dated: December 19, 2022

Respectfully submitted,

/s/ Laura E. Krabill

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